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**United States Bankruptcy Court**  
**Eastern District of Pennsylvania**

James Momoh Kemokai,

*Debtor.*

Chapter 13

Case No. 24-10277-AMC

**Motion to Modify Plan**

**AND NOW**, Debtor James Momoh Kemokai, by and through his attorney, moves this Court to modify his confirmed Chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on January 30, 2024.
2. The plan was confirmed on October 2, 2024
3. The current plan provides for pro-rata distributions to unsecured creditors.
4. The Debtor now wishes to sell his home.
5. The proposed modified plan is a 100% plan that provides for the sale of the Debtor's home.
6. The proposed plan also provides for the Debtor to continue making his current monthly payment to the trustee through the end of the 60-month plan.
7. Lastly, the proposed plan provides for the usage of part of the eventual sale proceeds from the Debtor's home to cover the difference between the base plan amount of the Debtor's current confirmed plan and that of the proposed 100% plan.
8. The Debtor asks this Court to approve the modified plan.

**NOW, THEREFORE**, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: July 11, 2025

CIBIK LAW, P.C.  
*Counsel for Debtor*

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